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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INTERNATIONAL GAME TECHNOLOGY and
IGT-UK GROUP LIMITED,

Plaintiff,

v.

ILLINOIS NATIONAL INSURANCE CO.,

Defendant.

Case No. 2:16-cv-02792-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

(Third Request)

Plaintiffs International Game Technology and IGT-UK Group Limited (collectively “IGT”) and Defendant Illinois National Insurance Co. (“INIC”), by and through their respective counsel of record, hereby stipulate and request that the Court extend certain discovery deadlines by approximately sixty (60) days. This is the third request by any party to extend any discovery deadlines in this matter.

Pursuant to Local Rule 26-4, the parties state as follows:

I. DISCOVERY COMPLETED TO DATE

- The parties conducted the Fed. R. Civ. P. 26(f) conference.
- The parties have exchanged initial and supplementary disclosures of documents and

1 lists of witnesses, including the exchange of tens of thousands of pages of
2 documents.

- 3 • IGT propounded requests for production of documents, to which INIC has
4 responded.
- 5 • INIC propounded requests for production of documents and interrogatories on IGT,
6 to which IGT has responded.
- 7 • IGT propounded interrogatories and requests for admissions on INIC, to which INIC
8 has responded.
- 9 • IGT has noticed the depositions of INIC's 30(b)(6) designee and multiple current
10 and former INIC employees.
- 11 • IGT issued subpoenas to multiple third-parties requesting production of documents.
- 12 • IGT issued subpoenas for deposition to three former employees of INIC.
- 13 • INIC propounded requests for admission and an additional set of requests for
14 production of documents on IGT, to which IGT has responded.
- 15 • The parties have engaged in multiple meet and confer teleconferences regarding the
16 above discovery.

17 **II. DISCOVERY TO BE COMPLETED**

- 18 • Deposition(s) of Rule 30(b)(6) designee(s) of INIC.
- 19 • Deposition(s) of current and former employees and/or representatives of INIC.
- 20 • Deposition(s) of Rule 30(b)(6) designee(s) of IGT.
- 21 • Deposition(s) of current and former employees and/or representatives of IGT.
- 22 • Deposition of the Rule 30(b)(6) designee(s) and/or officers/employees of Marsh &
23 McLennan Companies, Inc.
- 24 • Deposition of additional non-party fact witnesses.
- 25 • Disclosure of expert witnesses and rebuttal.
- 26 • Depositions of expert witnesses.

27 The above list is made without prejudice to the Parties' ability to conduct additional
28 discovery or to object to such discovery consistent with the Federal Rules of Civil Procedure.

1 **III. REASONS WHY DISCOVERY CANNOT BE COMPLETED WITHIN THE**
2 **CURRENT SCHEDULE**

3 As the Court is aware from the parties' previous submissions and as outlined above, the
4 parties in this case have engaged in written discovery and have attempted to resolve several
5 discovery issues that have arisen between them. Despite those efforts, the parties have reached an
6 impasse on several issues relating to the scope of discovery pending resolution of two motions that
7 are now before the Court: a motion by IGT to amend its complaint to assert causes of action for
8 breach of the implied covenant of good faith and fair dealing and violations of Nevada's Unfair
9 Claims Settlement Practices Act and a motion by IGT to compel discovery of documents and
10 deposition testimony from INIC. Absent a ruling from the Court on these pending motions, which
11 may impact the scope and extent of permissible discovery in this action, the parties are not able to
12 complete discovery and disclosure of expert opinions in this case under the current schedule.
13 Consequently, the parties request that the Court extend the remaining discovery deadlines,
14 beginning with the deadline for disclosure of expert witnesses, by approximately sixty (60) days,
15 as outlined below.

16 The parties agree that this extension is not made for the purposes of delay, but to allow
17 additional time for the court to decide the Motion for Leave and for the parties to complete fact
18 discovery, as necessary, before disclosing experts to ensure a just adjudication of the case on the
19 merits, and that none of them will be prejudiced by an extension.

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1 **IV. PROPOSED SCHEDULE**

2 WHEREFORE, the parties respectfully request that this Court extend discovery deadlines
3 as follows:

4 EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
5 Add Parties/Amend Pleadings	July 13, 2017	No Extension Requested
6 Designate Expert Witness(es)	December 11, 2017	February 9, 2018
7 File Interim Status Report	December 11, 2017	February 9, 2018
8 Designate Rebuttal Witness(es)	January 8, 2018	March 16, 2018
9 Close of Discovery	February 9, 2018	April 13, 2018
10 File Dispositive Motions	March 12, 2018	May 11, 2018
11 Joint Pretrial Order	April 9, 2018	June 8, 2018 *In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the decision of the dispositive motions or further order of Court.

14 Dated: November 15th, 2017

Dated November 15th, 2017

15 **BOWLER DIXON & TWITCHELL LLP**

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23 *Counsel for Plaintiffs International Game*
24 *Technology and IGT-UK Group Limited*

Counsel for Defendant Illinois
National Insurance Co.

25 **ORDER**

26 IT IS SO ORDERED.

27 DATED this 16 day of November, 2017.

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UNITED STATES MAGISTRATE JUDGE